

BEFORE THE ILLINOIS COMMERCE COMMISSION

Docket No. 01-0662

**Surrebuttal Testimony of John Muhs
On Behalf of Ameritech Illinois**

Ameritech Illinois Exhibit 16.1

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TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	CODING TROUBLE TICKETS – Checklist Item 2.....	2
III.	SWITCH TRANSLATION AND ROUTING ISSUES –Checklist Item 6....	5
IV.	CONCLUSION.....	13

SURREBUTTAL TESTIMONY OF JOHN MUHS
ON BEHALF OF AMERITECH ILLINOIS

I. INTRODUCTION

Q. Please state your name and business address.

A. John J. Muhs, 2000 W. Ameritech Center Drive, Room 4H04, Hoffman Estates,
Illinois 60196.

Q. By whom are you employed and in what capacity?

A. I am currently employed by SBC/Ameritech as General Manager, Ameritech
Network Regulatory and Legislative Strategy.

**Q. Are you the same John J. Muhs who previously submitted testimony in this
docket?**

A. Yes, I filed Rebuttal Testimony on April 22, 2002.

Q. What is the purpose of your Surrebuttal Testimony?

A. The purpose of my Surrebuttal Testimony is to respond to the trouble ticket
coding concerns raised by Rod Cox on behalf of TDS/McLeod. I will also
respond to statements made by Ms. Sherry Lichtenberg and Mr. Earl Hurter of
WorldCom, Inc., regarding problems with switch translations.

23 **II. PROPER CODING OF TROUBLE TICKETS—Checklist Item 2**

24 **Q. What concerns does Mr. Cox raise on lines 367-374 of his testimony?**

25 A. Mr. Cox is concerned that Ameritech Illinois may be coding “No Trouble Found”
26 more often on CLEC trouble tickets than for retail trouble tickets. He also
27 suggests that while Ameritech is assessing the “Trouble Isolation Charges” to
28 CLECs when “No Trouble Found” is coded, it may not be assessing retail
29 customers a like charge.
30

31 **Q. Why does Mr. Cox say that the “No Trouble Found” code may be used more**
32 **often on wholesale service calls than on retail service calls?**

33 A. Ameritech Illinois provided McLeod with data request responses which showed
34 that for the months of May 2001 through March 2002, “No Trouble Found” was
35 used 33-44% of the time on a wholesale service calls in Illinois, and 32 -36 % of
36 the time on a retail service calls. In most months the variation was as about 5%
37 with March 02 reflecting the high variation of 11%.
38

39 **Q. Would you expect there to be some variation?**

40 A. Yes. Ameritech Illinois works very hard to avoid the high cost of dispatching
41 technicians. One technique we have developed to reduce the number of
42 dispatches is to work with the customer to try to isolate the cause of the service
43 problem before a technician is dispatched. For example, the Ameritech Illinois
44 customer representative will ask the customer a series of questions to try to
45 determine whether the problem is a central office issue, a local loop issue, or a

46 problem with the customer's inside wire/CPE. If the problem can be isolated to
47 the central office or to inside wire/CPE, a dispatch can be avoided. This effort
48 has been a success for Ameritech Illinois. I do not know whether the CLECs have
49 devoted the resources to focus on this issue the way Ameritech Illinois has. If one
50 were to assume that, because of its experience with the issue, Ameritech Illinois
51 does a better job than the average CLEC of isolating trouble and avoiding
52 unnecessary technician dispatches, this would also be reflected in the data that
53 Mr. Cox references.

54
55 **Q. How do you address Mr. Cox's suggestion that Ameritech Illinois may not be**
56 **assessing its retail customers a like charge?**

57 A. Many Ameritech Illinois retail customers have Linebacker (or similar contracts)
58 which covers the cost of repair of the inside wire or CPE via a monthly
59 maintenance contract. Where the retail customer has the Linebacker plan it is clear
60 that Ameritech Illinois will not charge its customer for the cost of repairing inside
61 wire or CPE. On the other hand, when the Ameritech Illinois technician codes a
62 service call "No Trouble Found" and the trouble is closed to a billable code
63 (because the retail customer does not have a Linebacker plan), the customer is
64 billed the standard retail rate for a service visit. Where the customer has helped
65 us isolate the trouble they often fix it themselves, but more importantly they can
66 then decide to reject the service visit charges before I roll a truck. I hasten to add,
67 that if there is no NID (Network Interface Device), and I need to dispatch a

68 technician, neither the wholesale or retail customer is charged for the dispatch
69 (i.e. Trouble Isolation Charge).

70

71 **Q. How would Ameritech prefer to address Mr. Cox concerns in the future?**

72 A. Mr. Cox's non-specific allegations are difficult to analyze suggesting that they are
73 isolated and not indicative of any systemic problem. However I share Mr. Cox
74 concern.

75 With the thousands of technicians on the street, sometimes mistakes will be made.
76 I suggest Mr. Cox identify each specific incident to the McLeod or TDS account
77 teams. If he feels he is not getting resolution he can escalate to his Network
78 contacts as he has done in the past, and we will investigate each incident.

79

80 **II. SWITCH TRANSLATION AND ROUTING ISSUES—Checklist Item 6**

81

82 **Q. Mr. Hurter (lines 39-54) contends that there is an inconsistency between your**
83 **Rebuttal Testimony (lines 297-299) and Denise Kagan's Rebuttal Testimony**
84 **(lines 73-75) regarding switch translations. Please comment.**

85 A. My Rebuttal Testimony addressed two translation problems: (1) routing table
86 problems and (2) line translation problems. My Rebuttal Testimony correctly
87 indicated that the routing table problems could cause calls to be routed incorrectly
88 (i.e. toll calls could be incorrectly identified as local calls, or local calls could be
89 incorrectly identified as toll calls). Ms Kagan was discussing the line translation
90 problem and how the billing system handles the call record it receives from the

91 switch. This problem was solved in March 2002. I don't believe there is any
92 inconsistency between our testimony.

93

94 **Q. Mr. Hurter questions whether Ameritech Illinois has really fixed the switch**
95 **translations problems that WorldCom identified. (lines 146-174). How do you**
96 **respond?**

97 A. In my opinion these two network translations issues have been successfully
98 resolved, but I can appreciate Mr. Hurter's desire to examine his bills from
99 Ameritech Illinois over several billing cycles. I understand that during a meeting
100 on May 20, 2002 Ameritech Illinois provided further detail to assist him in that
101 examination.

102 To fix the line translation and routing table translation problems addressed in my
103 Rebuttal Testimony, the Network organization has instituted additional
104 monitoring routines to search for and question the existence of held messages.
105 We have found no new occurrences of the "NECC to coordinate error" which was
106 one source of the line translation problem. To maintain the cleanliness of the
107 routing tables (and to look for additional root causes of the errors), the Network
108 organization has instituted a second review of the routing table in every switch.
109 They have completed several switches and have found that the routing table
110 translation problems are not re-occurring.

111

112 **Q. Mr. Hurter continues to assert that WorldCom is being improperly billed for**
113 **intraLATA toll calls. Please address this issue.**

114 A. Although Mr. Hurter characterizes these issues as billing problems, that is not, in
115 fact, the case to the best of my knowledge. Mr. Hurter is objecting instead to
116 certain translation conventions that Ameritech Illinois uses in its network to
117 ensure that calls are properly assigned and billed to UNE-P customers. I will
118 address Mr. Hurter's complaints separately: (1) the billing of local toll calls to
119 WorldCom which are "LPIC'd" to Ameritech Illinois; (2) the billing of local toll
120 calls to WorldCom which are LPIC'd "NONE."

121

122 **Q. Please explain why WorldCom's local toll calls may be LPIC'd to Ameritech**
123 **Illinois.**

124 A. While UNE-P local calls are always routed using the Ameritech Illinois network,
125 and InterLATA calls are always routed to the IXC designated (PIC'd) in the line
126 record for the Unbundled Local Switching Port, there are two principle scenarios
127 for the designation of the intraLATA toll provider (which may be different than
128 the InterLATA toll PIC and is referred to as the "LPIC").

129

130 The first scenario is when an IXC is chosen as the LPIC. In this case, when the
131 routing table determines the call to be an intraLATA toll call, the call is handed
132 off to the IXC's POP to be carried on the IXC's network. Where the customer is
133 served by a CLEC, the appropriate ULS-ST (Unbundled Local Switching w/
134 Shared Transport) rate elements are billed by Ameritech Illinois to the CLEC to
135 cover Ameritech Illinois' costs incurred in providing the UNE-P facilities used by
136 the CLEC: e.g. ULS-Originating, ULS-ST SS7 Signaling Transport, and ULS-ST

137 DUF. ULS-ST Common Transport and ULS-ST Tandem Switching may also be
138 billed if transport is involved. The UNE-P CLEC would then bill its switched
139 access charges to the IXC for originating the call. Dial around calls (10-1-xxxx)
140 made from these lines whether local, intraLATA or interLATA would be treated
141 the same way.

142 The second scenario is when Ameritech Illinois provides the UNE-P CLEC with
143 local service and also provides the local toll service to the UNE-P CLEC; which
144 the UNE-P CLEC in turn uses to provide both local and local toll services to its
145 end users. In this scenario, the LPIC designation is 9999. This indicates that the
146 UNE-P CLEC is using Ameritech Illinois' intraLATA toll network to complete
147 the call and is the intraLATA toll provider for that end user.¹ While routing
148 appears very similar to the routing of an Ameritech retail customer call, for UNE-
149 P there is a AIN trigger which allows for the writing of the DUF record. In this
150 scenario, Ameritech Illinois bills the UNE-P CLEC the following rate elements:
151 ULS-Originating, ULS-ST SS7 Signaling Transport, ULS-ST Blended Transport
152 and ULS-ST DUF to cover its UNE-P costs incurred to complete the call.

153
154 **Q. Under these circumstances, should WorldCom be receiving a bill from**
155 **Ameritech Illinois?**

156 A. Yes, for all the rate elements I just described. Thus, Mr. Hurter's position that
157 WorldCom should not be receiving bills from Ameritech Illinois is simply
158 incorrect. To the extent Mr. Hurter believes that Ameritech Illinois is the
159 intraLATA toll provider just because the 9999 carrier identification code is used,

160 he is mistaken. As I just explained, that is a placeholder code that allows
161 intraLATA toll calls to be carried over Ameritech Illinois' network on behalf on
162 the UNE-P CLEC. Any intraLATA toll traffic with that code is properly billed to
163 the UNE P CLEC. The UNE-P CLEC will, in turn, bill its end users its retail rates
164 for that service.

165

166 **Q. Does Ameritech Illinois provide stand-alone local toll service to customers**
167 **who obtain their local service from a CLEC?**

168 A. No.

169

170 **Q. Mr. Hurter states that intralata toll usage bills should not be generated when**
171 **the LPIC is NONE. Please respond.**

172 A. The LPIC NONE designation is used when an end user does not want any local
173 toll calls completed on a direct-dialed, seven-digit or ten-digit (1 Plus) basis. In
174 this situation, the network blocks those calls. Therefore, Mr. Hurter's statement is
175 partially true. Since direct-dialed intraLATA toll calls cannot be placed from an
176 UNE-P line when the LPIC chosen is "NONE", no toll usage would be recorded
177 or billed. However, "dial-around" calls may be generated by the CLEC's end
178 users using the 10-1-XXXX dialing alternative, which routes the call to the IXC
179 which uses that dialing sequence. In this situation, toll usage would be recorded
180 and Ameritech Illinois would bill the UNE-P CLEC charges for these calls as
181 described above; and the CLEC would bill the IXC its originating access charges.

¹ See Illinois Tariff 20, Part 19, Section 22 ULS-ST with IntraLATA toll capability

182 Therefore, Mr. Hurter's position that WorldCom should never be billed for toll
183 calls from an LPIC NONE line is incorrect.

184

185 **Q. Worldcom witness Sherry Lichtenberg has complaints about the two switch**
186 **translation issue that you have resolved. How do you respond?**

187 A. Ms. Lichtenberg makes what I believe to be an inadvertent mischaracterization of
188 the extent of the switch translation problem when she says "*that Ameritech did*
189 *not translate 50,000 customer lines correctly. This is a big problem.*"

190 My testimony indicated that the problem affected 50,000 translation messages,
191 not 50,000 customers. A translation message includes: PIC changes, LPIC
192 changes, caller ID on or off, voice mail on or off, etc. There could be several
193 messages per customer line. More important, while the translation messages were
194 held, any service trouble identified by the customer would have been cared for
195 immediately. In other words, the unique translation problem was fixed manually
196 before we discovered the held messages. When the held messages were found,
197 each held message needed to be compared to the customer service record to make
198 sure the record still existed and that the change had not already been processed
199 manually, and that a subsequent change hadn't superceded the original held
200 message.

201

202 **Q. Ms. Lichtenberg also says that WorldCom has seen new billing errors since**
203 **the switch translation problem was fixed (lines 515-523). How do you**
204 **respond?**

205 A. She claims that since the problem was fixed in March 2002, "*WorldCom had over*
206 *220,000 new errors of this nature.*" This is an unfair exaggeration. The items
207 she refers to have been submitted to Ameritech Illinois as part of a standard
208 billing dispute resolution process. During such a process it is normal for
209 Ameritech Illinois and the CLEC to identify issues, to share data and to work
210 cooperatively to figure out the source of each dispute. For example, a party may
211 not correctly interpret a bill or may not be aware of a rate change reflected on the
212 bill. Sometimes, this process leads to the identification of problems in Ameritech
213 Illinois' network which are then fixed. It is entirely premature for Ms.
214 Lichtenberg to conclude, as she does, that all of the 220,000 items on the
215 Ameritech Illinois bill that WorldCom has disputed are "new errors of this
216 nature", i.e., the result of switch translations problems.

217

218 These items are currently being analyzed in the Ameritech Illinois Billing
219 organization. I am informed that many of the items in dispute were simply mis-
220 interpreted by WorldCom and that in a meeting on May 23, 2002, Ameritech
221 Illinois provided the WorldCom personnel with additional information on the
222 proper way to interpret those items on the bill. Ameritech Illinois also provided
223 more detailed reports for WorldCom to review.

224 I should also note that the analysis has not identified any network issues to date,
225 so there is no basis for Ms. Lichtenberg to assert that the disputed items are the
226 result of the line translation problem we resolved in March of 2002.

227

228 **Q. What comments would you like to make regarding Worldcom's Sherry**
229 **Lichtenberg's testimony on Ameritech Illinois' Routing Translation**
230 **problems (lines 531-579)?**

231 A. Ms. Lichtenberg states "*WorldCom has also received from Ameritech over seven*
232 *(7) million bad records for various Ameritech routing and translation problems.*
233 *Ameritech is in the process of reviewing these and determining what the root*
234 *causes of the problems are.*" This is a mischaracterization of the facts. These
235 records were not all attributable to routing and translation problems. By Ms.
236 Lichtenberg's own testimony "*This problem appears to stem from Ameritech*
237 *manual errors in updating the customer records and the Ameritech switch when*
238 *that customer migrates from Ameritech to another carrier, from Ameritech to*
239 *WorldCom, or from WorldCom to another CLEC.*" I take this to mean that the
240 order was written incorrectly and either didn't process or was processed with an
241 inappropriate LPIC (Line translation error). To the extent errors occurred as a
242 result of these allegedly bad records (and I do not concede that they did), the
243 problems were not were not caused by a routing table error.

244 She further states that "*Ameritech's manual ordering processes force service*
245 *representatives to enter codes identifying the CLEC that owns the customer*
246 *account. If these codes (the ZULS and New OCN FIDs) are wrong, daily usage*
247 *records will be sent to the wrong CLEC.*" Again, she identifies a manual process
248 which may occasionally cause an order not to process or to drive an incorrect
249 LPIC translation message. (A process which she states, has since been fixed to

250 force the codes to match). These mistakes would also not result in a routing table
251 error.

252 Some customers may have been delayed in their migration to WorldCom because
253 of the line translation problems I referenced earlier, as well as some of the manual
254 errors Ms. Lichtenberg alleges above, but the held message problem has been
255 fixed. The routing table problems have been fixed. As a business practice, the
256 Network organization will continue to investigate and fix all translation problems
257 identified by either the Wholesale or the retail account teams. Because translation
258 errors put revenues at risk, Network translation problems are dealt with swiftly.

259

260 **IV. CONCLUSION**

261 **Q. Does this conclude your testimony?**

262 **A. Yes**

263

264